

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

TYLER SAVINON,

Defendant.

Case No. 24-mj- 00235-AJ

AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT

I, Sean P. Doyle, United States Postal Inspector, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Postal Inspector by the United States Postal Inspection Service (“USPIS”) since July 2016. I was assigned to the USPIS Connecticut and Western Massachusetts Major Crimes Team from 2016 through August of 2019. In August of 2019, I transferred to the USPIS Manchester, NH Prohibited Mail Narcotics/Miscellaneous Crime Team. On these teams, my duties and responsibilities include, but are not limited to, the investigation of the illegal shipment of narcotics and narcotics proceeds, as well as the laundering of drug proceeds via the United States Postal Service (“USPS”) and the investigations of burglaries and robberies of USPS employees and facilities. Prior to becoming a U.S. Postal Inspector, I was employed for ten years as a police officer for the Town of Londonderry, New Hampshire.
2. The information set forth in this affidavit is based on my personal participation in this investigation, as well as my training and experience, and information received from other law enforcement officers. I have not set forth every detail I or other law enforcement

agents know about this investigation but have set forth facts that I believe are sufficient to evaluate probable cause for the issuance of the requested complaint.

3. I submit the facts below to establish probable cause to believe that Tyler SAVINON has committed the crime of aiding, abetting, counseling, commanding, inducing, and procuring the commission of robbery of property of the United States, in violation of 18 U.S.C. §§ 2114(a) & 2.

**GENERAL BACKGROUND CONCERNING THE UNITED STATES MAIL AND
POSTAL SERVICE KEYS**

4. Postal customers use blue collection boxes to send various types of U.S. Mail. First class mail is the most common type of mail sent by stamp and envelope. Some of the most common items sent in first-class mail by postal customers are checks. These checks are often placed into a USPS blue collection box on the street or at a post office. As a result, criminals routinely target USPS first-class mail placed in blue collection boxes to steal checks.
5. One method of stealing mail from a blue collection box is to obtain an “Arrow key” to unlock the box. These Arrow keys are the property of USPS and it is a federal offense (18 U.S.C. § 1704) for an unauthorized person to possess one. One method of obtaining an Arrow key is through the robbery of a postal carrier, which would constitute a violation of 18 U.S.C. §§ 111(a)(1) and 2114(a).
6. Criminals involved in mail theft from blue collection boxes often operate in organized groups recruited to perform specific functions. Some individuals are recruited to steal the mail, while others are recruited to provide their banking information to launder the stolen checks. These recruited account holders are often promised money in exchange for the use of their accounts.

PROBABLE CAUSE

7. Based on my investigation and that of others, including the review of witness/victim statements and surveillance videos/photos, on April 16, 2024, at approximately 2:39 PM, the Nashua, NH Police Department (“NPD”) responded to Blacksmith Way, Nashua, NH for a report of an armed robbery. Information was provided that a USPS Letter Carrier was held at gunpoint for his Arrow key. NPD spoke with the carrier, who stated he was robbed after delivering mail on Blacksmith Way. The carrier described that as he was walking back to his USPS van, a dark-skinned male wearing a black-colored balaclava and a gray sweatshirt was standing near the USPS van. The carrier stated this male pointed a black firearm at his chest and demanded his “keys to the city.” The carrier provided his keys to the male, which included an Arrow key. NPD was later able to obtain video surveillance from a residence, which was consistent with the carrier’s account of the incident. This video surveillance also depicted a second involved male, dressed in all black, who was behind the USPS van and potentially out of view from the carrier. A screen capture of the video is incorporated herein:



8. Inspectors and NPD conducted a canvass of the area following the incident. During the canvass, USPIS and NPD made contact with a local resident, who stated that he saw information about this incident on social media and believed he had pictures of the suspects and their vehicle. The resident stated that he saw the vehicle driving very slowly through the neighborhood and that the occupants' clothing was abnormal for the weather, given that it was a warm day and both had their hoods up over their heads. Two male occupants also entered and exited the suspect vehicle on several occasions for no apparent purpose. After noting the behavior, the resident entered his own vehicle, followed the suspects, and photographed them and the suspect vehicle.
9. The resident provided the pictures and video to law enforcement. Some of those images are incorporated herein:





The photographs the resident provided were consistent with the two suspects seen on the video of the robbery. Through these pictures, law enforcement was able to identify the suspect vehicle as a gray-colored Ford Flex bearing Massachusetts registration 9572XC.

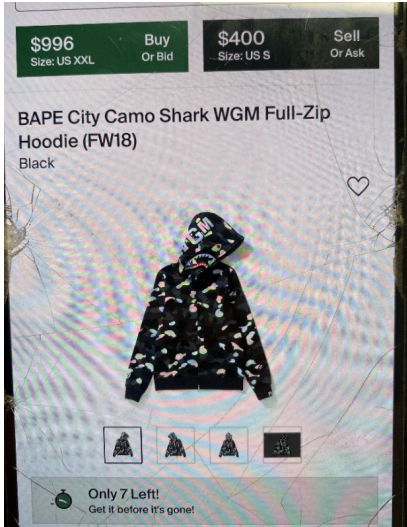
10. A query of Massachusetts registration 9572XC revealed the vehicle to be registered to W.C. at a specific address in Lowell, Massachusetts. NPD and Postal Inspectors proceeded to this address along with the Lowell, MA Police Department (“LPD”) in an attempt to make contact with this vehicle and its occupants. Upon doing so, law enforcement observed the Ford Flex traveling along Douglas Road in Lowell and were able to conduct a traffic stop on the vehicle on Glenellyn Street in Lowell. The driver of the vehicle was a juvenile male (“T.C.”). Law enforcement contacted T.C.’s parents, one of whom was the registered owner of the Flex, who responded to the scene of the traffic stop on Glenellyn Street. Based in part on speaking with T.C., investigators identified the robbers as Baraka JANVIER and a then-juvenile (“C.V.”).

11. Law enforcement responded to [REDACTED] in Lowell in an attempt to make contact with JANVIER and C.V. As law enforcement knocked and announced their presence at the front door, law enforcement in the rear of the residence heard doors and drawers

being opened and closed hurriedly. Seconds after the loud noises, C.V. and JANVIER exited the rear of the building in a hurried state. Law enforcement detained C.V. and JANVIER at the rear residence outdoor stairs. Both C.V. and JANVIER were brought to the front of the building by law enforcement and separated.

12. During the contact at [REDACTED], investigators obtained consent to search the residence and a vehicle for the Arrow key and other evidentiary items. During this search, two black pistol BB guns were located concealed in a clothing dryer, at the rear of the residence. A dark colored mask, consistent with the one worn by JANVIER during the robbery, was also located in the front seat of the vehicle.
13. In an interview, JANVIER stated that he and C.V. were driven to Nashua earlier in the day and robbed a mail carrier for a key. JANVIER stated he and C.V. met a male subject C.V. knew in Lowell after the robbery, and they gave that male the key.
14. When detained by law enforcement, JANVIER was still wearing pants which were consistent with the pants he was observed wearing while committing the robbery.
15. In an interview, C.V. stated that he learned through a Telegram channel that individuals were paying for USPS Arrow keys. C.V. stated that he and JANVIER had been transported to Nashua and JANVIER had used a BB gun to rob the mailman. C.V. admitted to being with JANVIER when he robbed the mailman. C.V. stated they were after the “key.”
16. C.V. stated that he and JANVIER went to the area of “Family Dollar,” later determined to be the Dollar Tree, on Newhall St. in Lowell, MA to sell the Arrow key for \$15,000. C.V. then changed his story to say that he met the buyer for the key identified as “Ty” at Olivera Park, on Newhall St. in Lowell, MA to sell the Arrow key. C.V. described “Ty” as a Hispanic male, with curly hair, skinny, 5’7,” wearing light blue jeans, a “Bape”

hooded sweatshirt and a Louis Vuitton messenger bag. C.V. looked up the “Bape” hooded sweatshirt on his phone and showed investigators which version “Ty” was wearing. A photograph is incorporated herein:



17. C.V. stated that he believed that “Ty” was going to keep the key and use it for financial crime. C.V. stated “Ty” was going to attempt to use the Arrow key on the night of the robbery to confirm its validity. If the key worked, “Ty” was going to meet with C.V. and JANVIER to pay them for the key.
18. C.V. provided consent to search his cell phone. During a review of C.V.’s phone, “Ty” was determined to have a Telegram username of @ [REDACTED], an Instagram handle of [REDACTED], and a phone number of [REDACTED]-4889. A search of CLEAR, a paid law enforcement database, which has proven reliable in previous investigations, identified that phone as being operated by Verizon Wireless. C.V. stated that “Ty” was a student at Lowell High School. C.V. stated that he heard that people bring their accounts to “Ty” and that he is the guy with “the checks.”
19. A text thread located on C.V.’s phone with “Ty,” at [REDACTED]-4889, showed that C.V. and “Ty” had been in contact since September of 2023, and that contact continued through

8:21 PM on the day of the robbery. The texts appeared to show that C.V. and “Ty” had been committing a variety of financial crimes together. One of the photos in the text thread appeared to show a “washed” check. Check washing is the process of altering a stolen check so that funds may be deposited into a different account, sometimes for a greater dollar amount.

20. On Thursday, April 17, 2024, the day following the robbery, a USPS Letter Carrier notified the Nashua, NH Postmaster that the white postal tub, which is normally placed in the bottom of a blue collection box to catch mail, was missing from the blue collection box located at the Bright Spot convenience store, 43 Dunstable Rd. Nashua, NH. This collection box is located approximately 1.2 miles from Blacksmith Way, Nashua, NH, where the robbery occurred the day prior. From previous investigations, Inspectors know it is common for suspects who have obtained USPS Arrow keys to attempt to use them in the proximity of where they are taken. Additionally, Inspectors know that the missing tub is often connected to the use of an arrow key. With the rear of the collection box open, to be expeditious and avoid being interdicted by law enforcement, targets often take the whole tub and all the mail it contains.

21. Records obtained from Cellco Partnership dba Verizon Wireless, for phone number [REDACTED]-4889, the number which C.V. had identified as belonging to “Ty,” showed that the number was associated with a Verizon reseller. Resellers are businesses that utilize the Verizon network to provide service for their customers. As such, Verizon does hold some of the records requested but the subscriber information is held by the reseller. For this phone number, Cellco Partnership dba Verizon Wireless identified the reseller as Comcast/Xfinity Mobile.

22. Records obtained from Comcast identified the subscriber of the account for phone number [REDACTED]-4889 as Julio Angel Savinon (“JULIO”), [REDACTED] Lowell, MA. Comcast specifically identified the device associated with phone number [REDACTED] 4889 as an Apple iPhone 14, bearing an IMEI of 350928999042110. In addition to phone number [REDACTED]-4889, Comcast identified nine other phone numbers associated with that account.
23. After identifying the Comcast account subscriber as JULIO, Inspectors contacted the Lowell, MA Police Department to see if they had any contacts with JULIO. Lowell Police records listed JULIO as residing at [REDACTED]. Lowell Police records showed JULIO with a date of birth of [REDACTED], and a phone number of [REDACTED]-8706. The phone number Lowell Police had listed for JULIO was one of the nine associated phone numbers identified by Comcast.
24. Based on JULIO’s age and likely use of a different phone number, investigators conducted research to attempt to identify additional family members of JULIO, specifically looking to identify if he had any children who could fit C.V. and JANVIER’s description of “Ty.” Utilizing a paid database, which searches and analyzes publicly available internet data and social media, investigators located information that JULIO was associated with a Tyler SAVINON with a listed age of 18. A search of SAVINON in the same database identified a connection to phone number [REDACTED]-4889 and a possible date of birth of [REDACTED].
25. Utilizing the name Tyler SAVINON and the possible date of birth of [REDACTED], investigators conducted a query of Massachusetts Registry of Motor Vehicle records. Those records identified an active Massachusetts driver’s license belonging to Tyler Angel SAVINON, date of birth of [REDACTED], of [REDACTED]. The license was issued

on April 8, 2024, and expires April 6, 2029. SAVINON is listed as 5'7" on his license.

SAVINON's license photograph is incorporated herein:



26. SAVINON's license photograph and information is consistent with C.V.'s description of "Ty" being a Hispanic male, with curly hair, skinny, and 5'7." Additionally, SAVINON is consistent with JANVIER's description of the "unknown male" as light skinned, possibly Puerto-Rican, approximately 17 to 18 years old, 5'7", skinny, and with a small mustache. Additionally, both C.V. and JANVIER stated that "Ty"/ "the unknown male" lived in Lowell, MA. SAVINON lives in Lowell, MA and his residence is approximately .2 miles from Olivera Park, on Newhall St. in Lowell, where both C.V. and JANVIER stated they met with "Ty"/ "the unknown male" to exchange the stolen Arrow key. Ty would also be a logical nickname for Tyler.

27. Investigators also reviewed records obtained from Snapchat, dba Snap Inc., for username [REDACTED]. C.V. had identified this username as being associated with "Ty." That information showed that on April 19, 2024, three days after the robbery, "Ty" changed his username from [REDACTED] to [REDACTED]. A previous username of [REDACTED] was also identified. Snap Inc. listed the phone number connected to the Snapchat account as [REDACTED]-4889, the number identified by C.V. and connected to SAVINON.

28. Investigators also reviewed records obtained from Meta, dba Instagram, for username [REDACTED]. C.V. had also identified this username as being connected to “Ty.” Information obtained from Meta showed the registered email connected to the [REDACTED] Instagram username was [REDACTED]@gmail.com. The account was registered on November 27, 2019, and is still listed as active.
29. On May 27, 2024, USPIS learned from the Nashua, NH Post Office that a customer reported a check being stolen. The customer advised the suspect altered the payee’s name, amount, and attempted to deposit the check via mobile deposit. The customer advised USPS that the check, written on a St. Mary’s Bank account and dated April 16, 2024, was deposited in the blue collection box outside the Bright Spot store.
30. St. Mary’s Bank provided a copy of the mobile deposited check which listed the payee as Miranda Grace Remo Bada, with a bank of first deposit of Bank of America (“BOA”). According to BOA records, on or about April 24, 2024, check number 1159, dated April 16, 2024, in the amount of \$3,190 was remote deposited into BOA account ending in 3202. The check was written off a St. Mary’s Bank account belonging to the victim who first reported the theft of his check to the Nashua Postmaster.
31. BOA collects geolocation information during the course of online banking activity. BOA also captures Internet Protocol addresses (“IP” addresses) and assigns a mobile device identifier once a mobile device successfully logs into a BOA account. Because every device that connects to the internet must use an IP address, IP address information can help to identify which computers or other devices were used to access an account.
32. According to BOA’s online activity records for account ending in 3202, on April 23, 2024, a successful login was made into this account from IP 73.149.28.201, at 11:00PM,

with a device ID of 1002522635. BOA's geolocation systems identified this IP as being located in the Lowell, MA area and with Comcast as the provider.

33. Additionally, that same IP, 73.149.28.201, successfully logged into the account ending in 3202, at 11:44PM on April 23, 2024, and at 12:04AM, on April 24, 2024. The device ID for both logins was 1002522635.

34. According to BOA's online activity records for account ending in 3202, on April 24, 2024, a successful login was made into this account from IP 174.242.135.83 at 12:18AM, device ID of 1002522635, the same device ID which was connected to the previous logins via Comcast IP 73.149.28.201. BOA's systems identified this IP as belonging to Verizon Wireless. This is the login for the mobile deposit of check number 1159.

35. BOA queried its records for Comcast IP 73.149.28.201 and found since January of 2024 that IP had been utilized 54 times to log in with five additional device IDs. Those device IDs were:

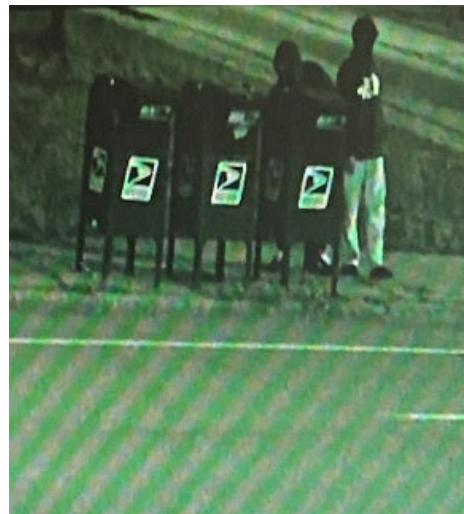
partyid	onlineid	deviceid
15041402111	mirbada18	1002522635
20077024409	supersavi10	571625467
20074655553	agil4039	845919276
10090512167	bebo06	1010661115
10090512167	bebo06	1010658097
20074655553	agil4039	945762807

Two of the online IDs, agil4039 and bebo06, connected multiple devices, resulting in them having two Device IDs being assigned to each Online ID, or customer ID. BOA systems geolocated all 54 of those logins to the Lowell, MA area.

36. On July 20, 2024, USPIS was notified of an alarm activation on one of the collection boxes outside the Nashua, NH Post Office, located at 38 Spring St., Nashua, NH. The alarm system notifies USPIS when collection boxes are accessed outside of normal

business hours. The Arrow key stolen during the April 16, 2024, robbery on Blacksmith Way, which was still missing, was the same series utilized to access the collection boxes outside the Nashua, NH Post Office.

37. USPIS investigators reviewed surveillance video from the Nashua, NH Post Office. The surveillance video shows two subjects, one of whom is carrying a backpack, approach the collection boxes from the north, walking south. The subject with the backpack appears to access the rear of the collection box while the other subject acts as a lookout. Photos of the suspects are incorporated herein:



38. Through video surveillance, investigators were able to track the suspects from the collection boxes to the CVS pharmacy, located 242 Main St., Nashua, NH 03060. One of the surveillance videos along the subjects' route of travel captured color images of the subjects. One subject is dressed in a what appears to be navy blue hooded North Face sweatshirt and light-colored pants. The subject has a cell phone in his hands. The second subject is dressed in a blue hooded sweatshirt, black mask, dark pants, what appear to be black New Balance sneakers with a white "N," and carrying a blue backpack. The surveillance photographs are incorporated herein:



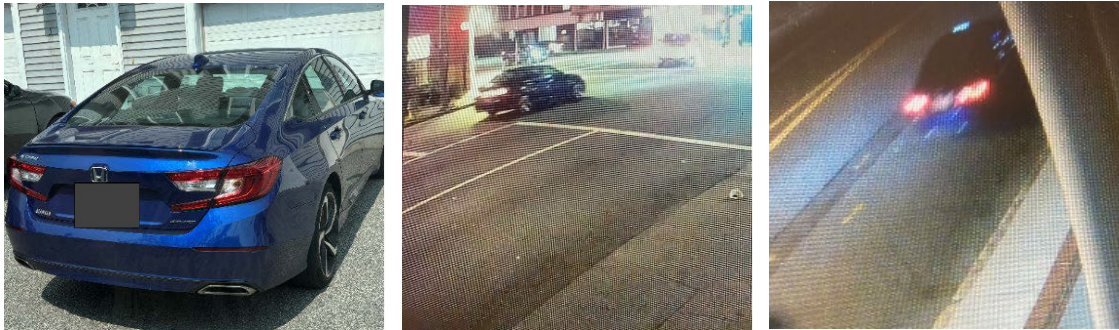
39. Surveillance shows on July 20, 2024, at approximately 10:20 PM, the subjects enter a vehicle that arrives at CVS. The vehicle departs the CVS parking lot, travels west on E. Hollis St., before making a left turn and traveling south on Main St. The vehicle depicted in the surveillance appears to be a blue, four-door Honda Accord. Surveillance photographs are incorporated herein:



40. On July 26, 2024, Inspectors canvassing the area of Main St., Nashua, NH, followed up with Bank of New England, located 295 Main St. While speaking with employees at Bank of New England regarding surveillance video, I was advised that Bank of New

England had a customer who was a recent victim of a check fraud. The customer advised Bank of New England a check he deposited in the blue collection box outside the Nashua, NH Post Office, 38 Spring St. Nashua, on July 20, 2024, had been stolen, altered and attempted to be cashed.

41. While conducting surveillance at [REDACTED], investigators observed a blue Honda Accord, Massachusetts registration [REDACTED] parked in the lot that appeared consistent with the vehicle seen in Nashua surveillance from the July 20, 2024, collection box theft. A photograph of the Accord, next to two of the Nashua surveillance images is incorporated below:



42. A check of a law enforcement database showed that on July 20, 2024, at approximately 11:23 PM, the Honda Accord with registration [REDACTED] was at the intersection of Rogers St. and Lawrence St. in Lowell, MA. That intersection is approximately .2 miles from the [REDACTED]. This is consistent with the Honda Accord being the vehicle shown in the Nashua surveillance footage and returning to [REDACTED] after the July 20, 2024 collection box theft.
43. Location records obtained from Verizon Wireless for SAVINON's [REDACTED]-4889 phone, for the weeks of August 25, 2024, through September 5, 2024, show that the device has been located in the area of [REDACTED] during the overnight hours for the entire time period.

CONCLUSION

44. Based on the foregoing, I submit that there is probable cause to believe that SAVINON has committed the crime of aiding, abetting, counseling, commanding, inducing, and procuring the commission of robbery of property of the United States, in violation of 18 U.S.C. §§ 2114(a) & 2.
45. I request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation.

/s/ Sean P. Doyle
Inspector Sean P. Doyle
United States Postal Inspection Service

The affiant appeared before me by telephonic conference on this date pursuant to Fed. R. Crim. P. 4.1 and affirmed under oath the content of this affidavit.

Date: 9/13/2024
Time: 10:18 AM

/s/ Andrea K. Johnstone
Hon. Andrea K. Johnstone
United States Magistrate Judge